

919 THIRD AVENUE NEW YORK, NY 10022-3908

JENNER & BLOCK LLP

September 10, 2020

Anthony S. Barkow
+1 212 891 1662
ABarkow@jenner.com

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 2102
New York, NY 10007

Re: *United States v. Dante Stephens*, No. 15-cr-95 (AJN)

Dear Judge Nathan:

Defense counsel respectfully writes to inform the court that Mr. Stephens will be entering an admission at the September 23 court appearance. In response to the Court's September 9 order, ECF No. 2990, Mr. Stephens prefers to proceed by videoconference or teleconference. Mr. Stephens consents to conduct the proceeding remotely, by video or teleconference, and enclosed is his consent form, signed by defense counsel on the authorization of Mr. Stephens.

Additionally, we respectfully request that sentencing occur on a date subsequent to the September 23 court appearance, on or after September 30, so that defense counsel can prepare and submit a short sentencing letter. We further respectfully request that Mr. Stephens remain on home confinement pending sentencing. The government does not oppose the request to hold the sentencing hearing on a subsequent date, however the government's position is that Mr. Stephens should be incarcerated during any period between admission and sentencing. In light of Mr. Stephens's 24-hour home confinement and electronic location monitoring conditions, his compliance with these conditions since they were imposed in March, and the continued and indeed increased threat of COVID-19 in jail facilities, we request that Mr. Stephens remain on home confinement during the short period between admission and sentencing.

Respectfully submitted,

JENNER & BLOCK LLP
By: /s/ Anthony S. Barkow
Anthony S. Barkow
JENNER & BLOCK LLP
919 Third Avenue
New York, New York 10022-3908
Telephone: (212) 891-1600
Facsimile: (212) 891-1699

abarkow@jenner.com
Attorney for Dante Stephens

cc: AUSA Jamie Bagliebter (via ECF and email);
AUSA Allison Nichols (via ECF and email);
Probation Officer Lauren Blackford (via ECF and email)